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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN DEMARCO THOMAS,

Defendant.

Case No.: 2:22-cr-00129-CDS-DJA

**Unopposed Motion to Amend  
Indictment**

On June 8, 2022, the Grand Jury issued an indictment charging Christian Demarco Thomas with one count of *Felon in Possession of a Firearm*, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), and one count of *Felon in Possession of Ammunition*, in violation of 18 U.S.C. §§ 922(G)(1) and 924(a)(2). The caption on the Criminal Indictment misspelled the defendant's name – the H in his first name was missing (Cristian). The government seeks to file an Amended Criminal Indictment, attached as Exhibit 1, to correct the scrivener's error. The government contacted defendant's counsel on Thursday,

1 June 16, 2022, and defendant does not object to the filing of the Amended Criminal  
2 Indictment.

3 DATED: June 21, 2022

4 JASON M. FRIERSON  
5 United States Attorney  
6 District of Nevada

7 /s/ Bianca R. Pucci  
8 BIANCA R. PUCCI  
9 Assistant United States Attorney

10  
11 **IT IS SO ORDERED.**

12 DATED: June 23, 2022

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15 DANIEL J. ALBREGTS  
16 UNITED STATES MAGISTRATE JUDGE  
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**GOVERNMENT EXHIBIT LIST**

- Exhibit 1: Amended Criminal Indictment

# EXHIBIT 1

JASON M. FRIERSON  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTIAN DEMARCO THOMAS,

Defendant.

**AMENDED CRIMINAL  
INDICTMENT**

Case No.: 2:22-cr-00129-CDS-DJA

**VIOLATIONS:**

18 U.S.C. §§ 922(g)(1), 924(a)(2) – Felon in  
Possession of a Firearm

18 U.S.C. §§ 922(g)(1), 924(a)(2) – Felon in  
Possession of Ammunition

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

Felon in Possession of a Firearm  
(18 U.S.C. §§ 922(g)(1), 924(a)(2))

On or about April 21, 2022 in the State and Federal District of Nevada,

**CHRISTIAN DEMARCO THOMAS,**

defendant herein, knowing he had previously been convicted of a crime punishable by  
imprisonment for a term exceeding one year, that is: *Carrying a Concealed Firearm or Other*

1 *Deadly Weapon*, in the Eighth Judicial District Court for Clark County, Nevada, on or about  
 2 February 15, 2012, in case number C-11-276712-1; *Battery with use of a Deadly Weapon*, in the  
 3 Eighth Judicial District Court for Clark County, Nevada, on or about March 12, 2012, in  
 4 case number C-11-277045-1; *Attempt Carrying a Concealed Weapon*, in the Eighth Judicial  
 5 District Court for Clark County, Nevada, on or about May 22, 2012, in case number C-11-  
 6 273282-1; *Ownership or Possession of Firearm by Prohibited Person*, in the Eighth Judicial  
 7 District Court for Clark County, Nevada, on or about April 5, 2015, in case number C-14-  
 8 301595-1; *Attempt Battery with Substantial Bodily Harm*, in the Eighth Judicial District Court  
 9 for Clark County, Nevada, on or about April 9, 2015, in case number C-15-304602-1; and  
 10 *Ownership or Possession of Firearm by Prohibited Person*, in the Eighth Judicial District Court for  
 11 Clark County, Nevada, on or about June 3, 2021, in case number C-20-351562-1; knowingly  
 12 possessed a firearm, that is: a Glock 21, 45 caliber firearm, bearing serial number G43068;  
 13 said possession being in and affecting interstate commerce and said firearm having been  
 14 shipped and transported in interstate commerce, all in violation of Title 18, United States  
 15 Code, Sections 922(g)(1) and 924(a)(2).

16 **COUNT TWO**

17 Felon in Possession of Ammunition  
 (18 U.S.C. §§ 922(g)(1), 924(a)(2))

18 On or about April 21, 2022 in the State and Federal District of Nevada,

19 **CHRISTIAN DEMARCO THOMAS,**  
 20

21 defendant herein, knowing he had previously been convicted of a crime punishable by  
 22 imprisonment for a term exceeding one year, that is: *Carrying a Concealed Firearm or Other*  
 23 *Deadly Weapon*, in the Eighth Judicial District Court for Clark County, Nevada, on or about  
 24 February 15, 2012, in case number C-11-276712-1; *Battery with use of a Deadly Weapon*, in the

1 Eighth Judicial District Court for Clark County, Nevada, on or about March 12, 2012, in  
2 case number C-11-277045-1; *Attempt Carrying a Concealed Weapon*, in the Eighth Judicial  
3 District Court for Clark County, Nevada, on or about May 22, 2012, in case number C-11-  
4 273282-1; *Ownership or Possession of Firearm by Prohibited Person*, in the Eighth Judicial  
5 District Court for Clark County, Nevada, on or about April 5, 2015, in case number C-14-  
6 301595-1; *Attempt Battery with Substantial Bodily Harm*, in the Eighth Judicial District Court  
7 for Clark County, Nevada, on or about April 9, 2015, in case number C-15-304602-1; and  
8 *Ownership or Possession of Firearm by Prohibited Person*, in the Eighth Judicial District Court for  
9 Clark County, Nevada, on or about June 3, 2021, in case number C-20-351562-1; knowingly  
10 possessed ammunition, that is: a Winchester hollowpoint .45 caliber cartridge, and 12 Speer  
11 hollowpoint .45 caliber cartridges; said possession being in and affecting interstate  
12 commerce and said firearm having been shipped and transported in interstate commerce, all  
13 in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

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15 **DATED:** this 21st day of June, 2022.

16 **A TRUE BILL:**

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19 JASON M. FRIERSON  
United States Attorney

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22 BIANCA R. PUCCI  
Assistant United States Attorney  
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